REMARKS

Claims **1, 3-5, 7-9, 11-20, 22-26, 28-31, 33-36** and **38-45** are pending in the application.

Claims **1, 3-5, 7-9, 11-20, 22-26, 28-31, 33-36** and **38-45** stand rejected.

Applicants have proposed amendments to Claims **1, 9, 20, 22, 26, 29, 30-31, 36, 43,** and **44**. Support for the proposed amendments can be found in at least paragraph [0026] of the present Specification. Applicants assert that the present proposed claim amendments should not be construed as indicating Applicants' acceptance of the reasons for rejection presented in the Office Action.

Rejection of Claims Under 35 U.S.C. § 103

Claims 1, 3-5, 7-9, 11-20, 22-26, 28-31. 33-36 and 38-45 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Juan Sanchez Diaz et al., "From User Requirements to User Interfaces: A Methodological Approach," 13th Int. Conf., CAiSE 2001, in 2068 Lecture Notes in Comp. Sci. 60 (K.R. Dittrich, et al., eds., Springer-Verlag, June 4-8, 2001) ("Diaz") in view of Charisius et al., U.S. Patent Application Publication No. 2002/0104071 ("Charisius"). While not conceding that the cited references qualify as prior art, but instead to expedite prosecution, Applicants have chosen to respectfully disagree and traverse the rejection as follows. Applicants reserve the right, for example, in a continuing application, to establish that the cited references, or other references cited now or hereafter, do not qualify as prior art as to an invention embodiment previously, currently, or subsequently claimed.

Applicants respectfully assert that Diaz and Charisius, taken alone or in any permissible combination, fail to disclose, teach, or suggest the limitations of the independent claims. For example, Diaz and Charisius, taken alone or in any permissible combination fail to disclose, teach, or suggest "in response to a user selection of a first view among the plurality of views, presenting an interactive representation of the first view, wherein the interactive representation of the first view accepts user input and generates a result in response to the user input," as recited in the amended independent claims.

Diaz and Charisus, taken alone or in any permissible combination, fail to disclose, teach, or suggest the aforementioned limitations of the amended independent claims because both Diaz and Charisus, taken alone or in any permissible combination, fail to contemplate the importance of manipulating or testing of any sort of "interactive representation" (as discussed below), much less an "interactive representation of the first view" that "accepts user input and generates a result in response to the user input," as claimed in the amended independent claims.

In stark contrast, the claimed invention provides an "interactive representation: that "accepts user input and generates a result in response to the user input." In fact, in response to a user selection of a view (which is presented as a static, non-interactive representation) among a plurality of views, the "interactive representation" is presented. The user selection of a view initiates a changeover from a static, non-interactive representation to an interactive represesation.

For example, Diaz discusses "user interface generation" where message sequence charts (MSC) are converted into user interface components. Page 70, first paragraph,

Diaz. Each argument type corresponds to at least one user interface widget. By parsing

an MSC, a user interface is generated corresponding to the arguments included in the

MSC. Page 70, third paragraph, Diaz. According to page 70 of Diaz,

> Once a form has been generated according to our method, it can be modified using the target visual programming environment. It can also be animated by using symbolic execution, simulating the execution of the associated state transition diagram of the user interface object.

While Diaz discusses animating a form (e.g., user interface), nothing in Diaz discloses,

teaches, or even suggests that such form is an "interactive representation that accepts user

input and generates a result in response to the user input," as claimed. In fact, Diaz's

form is animated, which "simulate[s] the execution of the associated state transition

diagram of the user interface object." Page 70, fifth paragraph of Diaz. Such state

transition diagrams represent "the … lifecycles [*sic*] of the objects, and they can also be

used to describe the behavior of the application user interface." Page 63, third paragraph

of Diaz. In other words, the animation of Diaz's forms merely show a step-by-step

execution of a state transition diagram instead of offering an interactive experience where

user input is accepted and a result is generated in response to the user input, as claimed.

Thus, Diaz's forms are neither interactive nor have the ability to generate results in

response to user input, as claimed.

Charisius does not remedy the defect in Diaz since Charisius also does not

disclose, teach, or suggest any sort of "interactive representation," as claimed. Charisius

discusses:

> The improved software development tool of the present invention allows a developer to simultaneously view a graphical and textual display of source code. The graphical and textual views are synchronized so that a modification of one view is automatically reflected in the other view.

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The mere synchronization of a graphical and textual view does not disclose, teach, or suggest an "interactive representation of the first view" that "accepts user input and generates a result in response to the user input," as claimed in the amended independent claims, Charisius's graphical view is merely a graphical representation of source code. Thus, there is no disclosure, teaching, or suggestion that such graphical view enables user interaction such as accepting user input and generating a result in response to the user input, as claimed in the amended independent claims.

In fact, one of skill in the art would not even expect Diaz and Charisius, taken alone or in any permissible combination, to disclose, teach, or suggest the claimed interactive representation" since neither Diaz and Charisius discloses any sort of graphical representation of a user interface that is interactive, much less one that becomes interactive, as claimed in the independent claims.

Thus, since Diaz and Charisus, taken alone or in any permissible combination, fail to disclose, teach, or suggest the limitations of the independent claims, Applicants assert that independent Claims 1, 9, 20, 26, 31, and 36 and all claims dependent therefrom are patentable. Applicants therefore respectfully request that the rejections be withdrawn.

CONCLUSION

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicant hereby petitions for such extensions. Applicant also hereby authorizes that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,

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